



Analysis of Public Comment

CAT

Content
Analysis
Team

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200 E
Broadway
Room 301
P.O. Box 7669
Missoula, MT
59807
406-329-3038



U.S. Department of the Interior, Fish & Wildlife Service

The Eastern Massachusetts
National Wildlife Refuge Complex

Assabet River, Great Meadows,
Oxbow Wildlife Refuges

Draft Comprehensive
Conservation Plan and
Environmental Assessment



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Introduction

The contracted U.S. Forest Service Content Analysis Team report summarizes public comment submitted on the Draft Comprehensive Conservation Plan and Environmental Assessment (hereafter Draft CCP/EA) prepared to describe the alternatives for the Assabet River, Great Meadows, and Oxbow refuges in the Eastern Massachusetts National Wildlife Refuge Complex. This report provides a narrative review of concerns raised as well as appendices detailing the coding process for reviewing public comments, analyzing demographic information derived from responses, and listing individuals responsible for the analysis. The narrative summary provides an overview of pervasive themes in public sentiment rather than a comprehensive description of each public concern.

Public input on the Draft CCP/EA is documented, analyzed, and summarized using a process called content analysis. This is a systematic method of compiling and categorizing the full range of public viewpoints and concerns regarding a plan or project. This process makes no attempt to treat comments as votes. In no way does content analysis attempt to sway decision makers toward the will of any majority. Content analysis ensures that every comment is considered at some point in the decision process. Content analysis is intended to facilitate good decision-making by helping the planning team to clarify, adjust, or incorporate technical information into the final guidelines. The process facilitates agency response to comment.

All responses (i.e., letters, emails, faxes, oral testimony, and other types of input) are included in this analysis. In the content analysis process, each response is given a unique identifying number, which allows analysts to link specific comments to original letters. Respondents' names and addresses are then entered into a project-specific database program, enabling creation of a complete mailing list of all respondents. The database is also used to track pertinent demographic information such as responses from special interest groups or federal, state, tribal, county, and local governments.

All input is considered and reviewed by an analyst. Comments are then entered into the database. In preparing the final summary analysis, public statements are reviewed again using database printouts. These reports track all coded input and allow analysts to identify a wide range of public concerns and analyze the relationships between them in a narrative summary.

The U.S. Fish and Wildlife Service solicited comments on the Draft CCP/EA from July 20, 2003 to September 3, 2003.

During the comment period, 1,907 responses, oral and written, were received. Twenty-five responses were duplicates; therefore 1882 responses were entered into the comment database. Organized response campaigns (forms) represented 70 percent (1,334 of 1,907) of the total responses.

Summary of Comments

Synopsis

The general tenor of comments is appreciative and laudatory. Typically, respondents endorse Alternative B. While there are many specific exceptions to these trends, the two most common are opposition to new or increased hunting on the refuge, and opposition to proposed limits on non-motorized recreation on the refuge, such as dog-walking and picnicking. Endorsement of Alternative B is often couched with provisos, such as that it eliminate hunting on the refuge.

Where analysts were able to identify unit-specific comments (such as those about the Great Meadows), the database includes that identification; FWS may wish to review unit-specific comments. In general, however, analysts do not discern any appreciable difference in comments addressed to the various units. The overall themes of comments are the same, and most specific suggestions could apply equally to all three refuges. Where site-specific suggestions or concerns are relevant to this summary, they are identified.

Planning Processes

General Planning

Although respondents are generally complimentary of U.S. Fish and Wildlife Service (FWS) staff and the CCP/EA, commentors provide some suggestions and various criticisms of the document. Respondents also request an opportunity to revisit the plan after its implementation and make any necessary changes.

Time frame for planning/length of comment period

Some respondents are disappointed in the comment period, arguing that holding the comment period during the summer months limits the informed input that communities and individuals can give. Specifically, the Suasco Watershed Community Council states, “The summer timing of this public review may have inadvertently and unfortunately limited public comment.” Also, some respondents want more time to review the “technical and voluminous” conservation plan so that they may submit more informed comments. Respondents are also disappointed that the agency failed to adequately inform the public of the comment period. One respondent from Concord, for example, wanted notice of the comment period posted on the bulletin board at the Great Meadows Refuge. The FWS, some argue, should extend the comment period and improve outreach efforts so that communities and individuals may provide well-informed and useful comments.

Public Involvement

Many respondents feel satisfied with the FWS’s level of public involvement and education; they praise the agencies past efforts and eagerly anticipate additional opportunities for interest groups and communities to stay involved in the refuge’s management. One Maynard respondent affirms, “Your efforts to involve the local communities are appreciated and should benefit us all.” There are, however, a significant number of respondents who believe the FWS could improve their public involvement and education efforts. One individual states, “Community members in the towns abutting the land appear to have very little knowledge about your proposal, and therefore have had very little input.” Respondents urge the FWS to hold more public meetings in schools, libraries, senior centers, and town offices, as well as take advantage of the media to improve public involvement and educate communities. “[Great Meadows Refuge] is a wonderful opportunity for public outreach—a place to engage dedicated environmentalists in a dialogue with U.S. Fish and Wildlife and to recruit new support for the service and its mission.”

Civic and conservation organizations express interest in collaborating with the FWS on management issues. The City of Marlborough Conservation Commission, for example, would like to work cooperatively with the FWS in managing the Refuge Complex and the Memorial Forest and Desert Natural Area “to enhance biodiversity and wildlife while allowing public access where suitable.” Conservation commissions from other towns express

interest in collaborative management as well. Similarly, respondents nominate the Massachusetts Audubon Society, the Trustee of Reservations, the Friends of Assabet River Wildlife Refuge, The Friends of the Oxbow National Wildlife Refuge, The Great Meadows Neighborhood Association, Bay State Trail Riders Association, and the Sudbury Valley Trustees as good candidates for public involvement.

Relationship to Regional Planning Efforts

Respondents ask for clarification of the CCP's compatibility with other regional management efforts, such as: the Maynard Open Space by-law for the Maynard portion of the Sudbury Annex in 1987 and its hunting restrictions; the Freedom's Way Association bill currently before congress to formally designate 43 communities as a national heritage area near the Great Meadows complex; wildlife management and conservation restrictions near Bolton Flats and Devens South Post; the goals of Wild and Scenic River designations; and the original intent of the O'Rourke farm "river reservation."

Statutory Authority

Respondents sometimes address real or perceived conflicts between the CCP and federal or state law. Some respondents remind the FWS that projects proposed "within the Oxbow boundary are subject to the Massachusetts Endangered Species Act," and that the National Wildlife Refuge Improvement Act of 1997 permits hunting as "one of six priority wildlife-dependent uses."

Trust and Integrity

Some respondents question the intent of the agency, and are disappointed that the land management decisions proffered in the CCP do not reflect the historical uses of the land. "I know that I would not have voted for FWS to take the land if I had believed that I would never have access to that property for recreational use. You duped the residents of these towns so that you could get this property," exclaims one respondent.

Other respondents, however, praise the FWS staff and their efforts. These respondents trust the agency to make appropriate land management decisions based on expertise and dedication.

Clarity/Organization of Planning Documents

Many respondents approve of the CCP and commend the agency. "I would like to say that it is an impressive document [and] remarkably well-written," comments one typical respondent. Commentors also support the document's consideration of and compatibility with neighboring areas.

Some respondents express disappointment, however, in the agency's website performance and the size of the electronic document.

Technical & Editorial

Respondents suggest the agency provide clearer, more accurate maps. Respondents also provided editorial suggestions. For example, “Correction: The Commission would like to point out an error on the map on page 2-71. A parking lot is shown on Maple St. north of the service road. This site is in fact a private home. There is a parking lot across the street on Greenough Conservation Land existing there.” Another respondent wrote, “Please correct the capitalization on Sudbury section maps 2-6, 2-7, 2-16 to Sherman Bridge Road. It is two words. It’s a street in Wayland.”

Purpose and Need

Range of Issues

Some respondents feel that FWS is making a mistake in classifying certain issues as beyond the scope of the EA. These respondents want the FWS to evaluate and mitigate noise and air pollution impacts on visitors and wildlife caused by Hanscom Field air traffic. One commentor states, “The CCP should include a plan to evaluate impacts to waterfowl, especially during nesting seasons, from air traffic at Hanscom Field. The CCP should identify noise from Hanscom Field as an issue with which the U.S. Fish and Wildlife staff should be more involved.” Respondents protest the expansion of Hanscom Field and its related impacts to the visitor experience; and ask that FWS partner with local communities and federal agencies—the Department of Transportation and the Federal Aviation Administration—to analyze the impacts of the expansion. One conservation organization asks the FWS to participate in the evaluation of jet ski impacts to recreation and wildlife on the Concord River.

Guiding Policy for Public Lands

Respondents repeatedly describe the agency’s mission as one of wildlife protection, and assert that human activities and development should be limited. “In establishing the permitted uses for the refuge, you must not bow to public pressure. You must follow the charter of a NWR. To do that, you need to establish what the sensitive species are in the refuge, and how they are best managed. You must define what additional resources should be involved to preserve habitat for the animals. This might include re-establishing topographical features, acquiring adjacent land, procuring easements on neighboring lands, or managing tourists.” Respondents emphasize the history of the land and its importance to local communities, and suggest that informed management decisions that benefit biodiversity would best preserve the refuge. To accomplish this, respondents suggest the agency “recognize areas in proximity to the refuge and consider such in managing refuge resources,” as wildlife and ecosystems do not recognize political boundaries.

The land that makes up the Assabet River, Great Meadows, and Oxbow Wildlife Refuges is important to the people in the neighboring communities. Many respondents feel connected to the land, historically, spiritually, and personally.

Alternatives

Many respondents either support Alternative A or B, while little is said regarding Alternative C. Proponents of Alternative A are concerned about expanding or limiting specific activities such as hunting and dog-walking. Some of these respondents request not expanding or allowing hunting. Other respondents ask to retain, rather than prohibit, existing “non-wildlife” dependent activities. In general, these respondents desire Refuge Complex management to continue as is.

Respondents support Alternative B more for its management approach than allowed activities. Many of these respondents favor active management for invasive species and wildlife habitat. Additionally, supporters of Alternative B approve of the levels of funding and staffing proposed. Respondents are divided about the benefits of the phased opening of the refuge. Other concerns stemming from Alternative B include additional fees, allowed uses, and land acquisitions. Repeatedly, respondents endorse Alternative B while asking that it permit non-motorized uses such as dog-walking, and prohibit hunting.

Some respondents feel that no alternative considered is adequate. New alternatives suggested include: emphasizing non-consumptive, non-lethal approaches to population control; promoting the refuge as “open space,” not a hunting preserve; and providing more local level decision-making.

Affected Environment

General resources

One respondent requests that the FWS include in its bibliography the respondent's publication, "A Bibliography of the Biodiversity and the Natural History of the Sudbury River- Concord River Valley, including the Great Meadows, the Estabrook Woods, and Walden Woods."

One respondent avows support for "projects that deal with restoring the native ecology to the area."

Water quality

One respondent requests protection of water quality and quantity in the Assabet River corridor and drainage. Related to the issue of quantity, one respondent raises the issue of connected aquifers: "Areas outside the scope of the CCP and town water supply wells (Pg. 1-24): Protecting the remaining base flow—the groundwater that supplies flow to the streams during dry times—in the tributaries and main stem of the Assabet River is critical to protecting water quality and aquatic habitat in the watershed . . . therefore, we suggest that any requests for access to the refuges for the purpose of drilling new water supply wells be reviewed for impacts to the wetlands and tributary streams on and off the refuges and suggest using the groundwater model of the Assabet River watershed currently being developed by the US Geological Survey (Northborough) to evaluate potential habitat impacts of proposed increased withdrawals."

One respondent argues that water quality degradation should be a critical part of the CCP/EA, rather than being considered out of scope: "I thought the water quality section was weak. Having raised the red flag that the rivers are heavily contaminated, I did not feel that the text clearly explained what that meant for the public and for wildlife in the refuge, and what the prospects for correction are. For example, I had thought that a major current issue was discharge of excessive nutrients from waste water treatment plants leading eutrophication and low-oxygen conditions."

Vegetation

Respondents request that the FWS complete proposed cover-type maps to assess species occurrence and distribution. One respondent provides extensive advice: "Biological Inventories and Mapping Alternative B calls for a thorough inventory of all species on the refuges: It would be ideal to be that comprehensive. If priorities are needed, we suggest the following order of importance: Reptiles, especially turtles; Complete documentation of vernal pools; Invertebrates: Select representative habitats to inventory macro invertebrates in order to provide a representational picture of invertebrates in the different habitats on the refuge and to identify any rare species. Invertebrates can also serve as indicators of overall

ecosystem health; Benthic macro invertebrates: select representative habitats for river, stream, pond and wetland surveys within the refuge; Field invertebrates: select a methodology that targets representative field types, such as wet meadow and upland field.”

Several respondents suggest that the refuge should sustain and enhance grassland and shrubland habitat on all three units to promote early-successional species, many of which are in decline in the Northeast. One respondent suggests creation of a butterfly refuge on the south side of the patrol road running from the Hudson Road gate to the radar station.

Invasives

The need to inventory refuge resources is connected by one respondent to the need to control invasives: “The Service's proposal to complete a comprehensive invasive plant inventory by 2007 will help guide species-specific management. Many exotic and invasive plant species in the watershed have become discouragingly pervasive. SVT recommends that the Service prioritize its efforts on species that are threatening rare habitats, out-competing rare or state-listed species, or are still in low density numbers. The need for exotic species control research is great and the Service's proposal to participate in experimental invasive species control could result in new innovative methods.”

Many respondents support efforts to eliminate invasive non-native species. Indeed, a number urge the FWS to help catalyze a regional control effort in cooperation with abutters, state, federal, and town authorities, and non-profits, arguing that, “Without a systematic treatment of this issue, invasive plants will continue to be dispersed throughout the area by wildlife, people, and mechanical means.”

Several respondents raise concerns about invasives at Puffer Pond, given new fishing access to Puffer. One respondent writes: “At present Puffer Pond is pristine and free from invasive species such as milfoil and water chestnut that have infected other waterways within Massachusetts, especially in local ponds including nearby Lake Boon. Allowing canoes previously used in these infected waterways increases the probability of infecting Puffer Pond with these invasives. Canoe portage presents still another problem in that Puffer Pond is a fair distance from the existing entrances. If auto canoe portage were allowed to the pond, temporary parking (allowing driving on the refuge proper) for canoe launch would have to be provided. This could (would) become permanent parking because of the undesirability of leaving the canoe and its contents to move the canoe carriers to an approved parking area after launch and then walking back to the canoe launch area.”

Concerns about targeted species are raised in two cases: one respondent argues that cattails are native, and should not be removed; a number of respondents argue that mute swans are harmless and should be

Wildlife Management

The most commonly offered input regarding wildlife management reflects an overwhelming sense of community and a desire to harmonize refuge planning efforts with past, present, and future local and regional land management activities. As one respondent summarizes, “The physical configuration and multiple ownership (plus the unique natural history heritage) of

the valley demands a common vision and a systems and team approach. If all the landowners will work together in supporting and adding to the enormous environmental, natural resource and knowledge base that has already been put in place by past generations, the resulting synergy will produce a ‘refuge’ of far greater proportions and impact than could ever occur if each property owner goes off on his/her own.” This sentiment is reflected over and over in comments. Often, people state, “our town” or “our organization” already has wildlife survey data, or “our town/community” wishes to expand its knowledge of natural resources in the area. These respondents encourage FWS to utilize existing data and established management practices when making decisions for the refuge, and frequently urge FWS to “coordinate,” “consult,” and “share information.”

A related theme touched on by many respondents is the quality of wildlife species data provided in the CCP. Respondents request consistently high-quality data, and some respondents request that FWS provide the most up-to-date species information possible.

Some respondents argue that the agency is drifting away from what they perceive to be its central mission: providing “refuge” for wildlife. A number of people assert that in a wildlife refuge, wildlife needs should take precedence over human needs. Echoing this view, many people request that FWS conduct thorough wildlife assessments to determine what kinds of human activities (if any) might be appropriate on the refuge. A number of respondents believe that hunting and trapping for wildlife population control are not appropriate. Some people encourage non-lethal—or at least humane—population control methods.

All respondents who comment on wildlife monitoring support Alternative B; however, these people encourage FWS to provide more detail regarding how, when, and where monitoring will occur.

Refuge Administration

General Suggestions

A number of respondents urge FWS to address refuge management from a regional perspective, encouraging the FWS to integrate refuge management with the management of surrounding lands through community partnerships. Several people ask the FWS to justify splitting the Great Meadows refuge into two units. They argue that this area is all part of one ecosystem and, accordingly, should be managed as one unit.

The few people who address historical and archaeological sites simply ask the FWS to inventory these resources and to preserve and enhance them when possible.

Land Acquisition

Many respondents comment on the proposed land acquisition boundaries, with the majority of people in favor of expanding them. A typical respondent argues that, "In a plan that purports to run for the next 15 years, it seems shockingly shortsighted to limit land acquisition (including through donations) by the refuge." Some respondents suggest that expansion is the best way to protect whole ecosystems and waterways, while others encourage an expanded refuge area to protect threatened and endangered species and wildlife corridors. Some people ask the FWS to include specific areas, such as the former Fort Devens South Post area and parts of the Assebet and Nashua rivers, in the land acquisition boundaries.

Some respondents discourage the FWS from expanding the land acquisition boundaries. Typically these sentiments stem from disagreement with FWS management choices, such as limits on horseback use.

Buildings and Facilities

Respondents voice a myriad of opinions regarding what kinds of buildings and facilities should be provided at the refuge. Suggesting that visitor education is an important component of gaining public support for the refuge, a number of respondents encourage the FWS to build a visitor center or at the least, a contact station. Some of these respondents make more specific suggestions, such as using existing buildings for a contact station/visitor center or locating such a facility at Hudson Road or at Deven's near Jackson Gate. A number of people support the idea of an administration building on the refuge.

Citing the importance of public education, many people ask the FWS to locate kiosks at strategic locations throughout the refuge. Comments regarding refuge parking focus on lot location with many people discouraging parking at Heard Pond. These respondents contend that there has been too much garbage dumping and vandalism at the Heard Pond site to make it a desirable parking place. One respondent asks the FWS to place portable toilets at all parking facilities in the refuge. A number of people support development of an observation deck. A few other specific refuge management suggestions offered by respondents include:

remove barbed wire from the refuge, use smaller information signs, establish a picnic area with a bear-proof garbage can, and construct fire hydrants on White Pond Road and along Sudbury Road.

Staffing and Funding

Although one respondent believes that the refuge should not have rangers because they merely “. . . harass old ladies . . .,” most people feel that adequate refuge staffing is essential. While many people assert that Alternative B will meet desired staffing levels, a number of other respondents contend that proposed staffing levels are too low. These people cite anticipated user conflicts, present refuge hazards, and the current downsizing trend in government as reasons to increase proposed staffing levels. Some respondents suggest utilizing community groups and/or to form partnerships with volunteer organizations to supplement staffing needs.

With regard to refuge management funding, the only direction provided by respondents is a request that the FWS ensure its adequacy.

Enforcement

Respondents who comment on enforcement say that the level of enforcement on the refuge needs to increase. Some respondents suggest that implementation of some programs be delayed until adequate enforcement is in place. Others recommend developing a contingency plan in case proposed enforcement levels are not effective. An additional suggestion offered by some people is that the FWS have a backup force in place of either volunteers and/or community officers.

The key areas identified by respondents as needing increased policing efforts are off-highway vehicle trespass, poaching, dumping, trespass, and vandalism. As a typical respondent writes, “Preventing illegal use by ATVs is a major enforcement challenge for properties with large borders surrounded by suburban landscapes and with many potential entry points.”

Wild and Scenic Rivers

The one concern regarding wild and scenic river designation expressed by several respondents is that hunting is incompatible with this designation and should be prohibited within these areas.

Priority Public Uses

Analysis of Existing Conditions and Need for Further Analysis

Several respondents question CCP visitor estimates and request better calculations, one respondent suggesting that based on personal experience the estimate of 70,000 people per year visiting Oxbow is “wildly incorrect. It is probably more like 7,000.”

Numerous respondents request that scientific analysis of wildlife populations take place prior to any hunting or trapping. One conservation organization suggests that the CCP be driven entirely by wildlife surveys: “We suggest three overarching management priorities when considering policies about public use activities: 1. Public uses allowed under the CCP should be based on the findings of wildlife inventory and habitat management step-down plans. Public use plans should be based on wildlife inventory and habitat management plans; 2. The Service should monitor and adjust allowed public uses based on impacts to wildlife and habitat during the drafting/revision of step-down plans; 3. Public use should be coordinated among partner organizations with land holdings in the vicinity of refuges.”

Several respondents argue that ongoing monitoring will be critical to management of wildlife-dependent recreation, typically: “The proposed additional monitoring projects in Alternative B for all three refuges must include at least that level of detail about how the monitoring and evaluation will be carried out. For example: The CCP states on pages 2-29, 2-68, and 2-95 that the Visitor Services Plans, to be completed by 2007, for Assabet River, Great Meadows, and Oxbow Refuges would include a monitoring program to evaluate the intensity and potential impacts of all the wildlife-dependent public uses on the refuges. What data have you collected to date on this issue and what has your analysis of the results shown? What steps are now being taken or will be taken until 2007 when the monitoring program is in place to ensure that current management of wildlife-dependent uses is not having an adverse effect on the resources?”

General Management Direction

Respondents offer a number of suggestions for general management direction of the Refuge Complex relating to priority public uses, typically defining the extent to which they believe various recreational activities should be permitted. Many respondents, for example, argue that the refuge should be “open to the public,” by which they typically mean members of the public who undertake non-motorized recreation such as picnicking and jogging. For many, this is their defining test of the value of the refuge and a natural consequence of it being public land, e.g., since we pay taxes we get to use it.

For a few respondents, general access to the refuge is part payback for the original government acquisition of the land. For many more, there is a significant level of anger at the prospect of restriction of passive uses, e.g., “[Great Meadows] has been used with great respect and affection by the local public for well over the thirty years that we’ve lived here. I

can't imagine what reason or right the Federal Government might think it has to interfere with that use."

Some respondents acknowledge the mission of the refuge, and couch their suggestions in terms of "wildlife-dependent uses." These respondents suggest that jogging, dog-walking, picnicking, and bicycling are dependent on wildlife.

Many other respondents functionally argue that the purpose of the refuge should be redefined, making other arguments for permitting non-motorized recreation. For example, although few respondents articulate the thought as clearly and plainly, many implicitly advanced an argument in consonance with this comment: "The following suggestions are based upon the assumption that the primary purpose of the refuge is to preserve native species and habitat, but that other compatible uses are acceptable if they support and do not significantly interfere with the primary use."

Other respondents implicitly or explicitly question the priority attached to those activities defined as wildlife-dependent, e.g., "The boundary between wildlife-dependent and non-wildlife dependent activities is not always clear. The more important distinction, in our view, is between outdoor activities that have an adverse effect on the health and diversity of populations of natural organisms, and those that have little or no such impact."

Related to the assertion that only harmful public uses should be restricted, one respondent suggests that permitting only harmless uses would mean "hiking, skiing, snowshoeing, and not much else." A significant number of respondents asserted that off-highway vehicle use—legal and illegal—results in harm, and should be prohibited.

Some respondents offer support for the general direction of the FWS preferred alternative or general confidence in the agency's ability to sort things out. Some respondents ask the agency to monitor use and make appropriate judgments down the line, saying that the agency should continually evaluate relationship between recreational uses, ensure that all legal uses receive fair consideration and access, and minimize conflict.

Refuge Access

Again, many respondents argue for "access" to the Refuge Complex, by which they usually mean easy entrance for non-motorized recreation. While some respondents assert that certain specific activities (dog-walking, jogging, etc.) may negatively impact the refuge, most argue that non-motorized uses are harmless.

Regarding infrastructure, some respondents request that the FWS eliminate the maximum number of trails and roads to protect wildlife. Some respondents assert that off-trail access should be by permit only. One respondent asks that access be limited where it may impact state-listed rare species, such as Blanding's turtles, and argues that the FWS should survey for rare reptiles and amphibians before opening areas or new infrastructure for recreation access.

According to one respondent, "It would be nice if one long trail could be paved for handicapped people in wheelchairs."

Respondents provide many suggestions for specific access points and trails they would like to see developed.

Fees

A considerable number of respondents support fees for use of the Refuge Complex. As one respondent said at a public meeting, “They are great areas; I enjoy walking them a lot. I’d be happy to give somebody twenty bucks tonight to walk in them the rest of the year.” Some of those who support user fees hinge continued support on clear and appropriate local application of funds, or on fee levels remaining stable.

A considerable number of respondents also oppose user fees at the refuge. Some respondents oppose fees based on their perception that the FWS is effectively double-dipping; quote one respondent, “We’ve already paid through taxes.”

Respondents oppose user fees for a number of other reasons, arguing variously that fees will deter use (especially by low-income individuals) or alienate local residents and collaborators. Some perceive fees as a barrier, e.g.: “I am very much opposed to the plans for Great Meadows. This land has been use and enjoyed for many years, and I cannot fathom that access may be impeded by restricted hours and fees. The community benefits greatly from a refuge that is easily and freely accessible to all.” “It belongs to all of us,” another respondent writes, “not the few who are able to pay admission costs.” A number of respondents argue that fees change the nature of a recreational experience, e.g., “It destroys the soul of the experience.”

With regard to both opposition to fees and concern about the proposed fee schedule, it is worth noting that a number of respondents appear unaware of or uninterested in the possibility of purchasing an annual pass instead of paying upon each entrance to the park. For some respondents, then, fees may appear deceptively exorbitant.

With regard to fee schedules, several suggestions are advanced. Several respondents propose that local residents be exempted from fees. Some respondents suggest that volunteers receive free passes. A number of respondents suggest that hunting fees be higher than other entrance fees. Some respondents complain that a car full of hunters (for example) would be charged less for entrance than a family of bicyclists, and argue that non-motorized arrivals are less intrusive and solve parking problems, and should be admitted for lower charges than motor vehicles. One respondent suggests charging a parking fee, rather than an entrance fee.

Several respondents request clarification of fee schedules, in one case asking whether there are any fee differences between Alternatives B and C, and in another asking whether a \$15 annual duck stamp wouldn’t obviate the need to pay \$20 for an annual permit.

Respondents also offer suggestions and concerns regarding the mechanics of fee collection and enforcement. A number of respondents argue that enforcement will be impractical and expensive, arguing that self-service doesn’t work and that all refuge entrances will have to be staffed. Likewise, a number of respondents question whether entrance gates will work in a refuge with as many porous boundaries between local residences and conservation land as the refuge has. Several respondents ask whether fee income will be outweighed by financial and goodwill costs, and ask the FWS to provide a detailed analysis of costs and benefits.

Hunting

Hunting was the issue most frequently addressed in comments on the EMNWR CCP. The hunting issue most frequently raised by respondents was safety—many residents and recreationists fear that hunting will put them in danger. These responses merit close scrutiny, which follows in a section on public safety. However, many other issues were raised vis-à-vis hunting, and they will be discussed here.

Hunting advocates

Although lesser in number than those opposed to hunting, a number of both area residents and others voiced support for hunting on the Refuge. Some respondents assert that the purpose of refuges is conservation—not preservation—and that hunting should be allowed on all wildlife refuges. Others argue that hunting is plainly a wildlife-dependent activity, and one with important cultural and educational values. One respondent writes, “Hunting should also be recognized and allowed as a legitimate wildlife-dependent recreational activity. Pursuing wild game for sport and table fare is an American tradition as old as our country itself. Family bonds are forged and strengthened as parents pass on to their children valuable lessons in conservation and outdoor ethics. Hunting is a total wildlife-dependent experience that fosters an intimate knowledge of game and habitat and teaches a wide variety of wilderness skills.”

Other respondents argue that sportsmen and women have “been the primary source of funding” for many conservation efforts, provide money to FWS, and therefore deserve entry to the refuge complex. Some respondents assert that hunters have been losing territory to development in northeast Massachusetts for decades, and argue that the refuge complex should, in fairness, and to relieve hunting pressure on other areas, be available.

Addressing the issue of displacement, several respondents indicate that hunting does not impact other recreationists. As a typical respondent states, “If you're worried about compatibility issues on the river as to being able to share, I hunt the Sudbury River, and people go by in their kayaks, I don't shoot when they're paddling by. I wave to them. They don't wave back, but I wave to them. I'm sitting there with my dog just, you know, letting them go on by.”

Some hunting advocates also seek to allay safety concerns, arguing that hunting is an extremely safe sport. “Some local people have concerns about the opening of these areas to hunting. It is important to inform the public of the safeguards, rules and restrictions that will be associated with the harvest of resident wildlife. . . . If practiced safely hunting is no more dangerous than many other daily activities.”

Some respondents (hunters and non-hunters alike) suggest that the Refuge permit bow hunting only, .e.g., “Once the abutters have an understanding of how close one must be to their quarry to execute a lethal shot, they will also understand that before a shot is made, and there is no question about what it is the archer is taking aim at. So there will be no mistaking a human or household pet for a deer. . . . It is not some beer-guzzling bubba sitting in wait for the first thing that moves but rather responsible people who have been through state-mandated training in the sport of bow hunting and who are dedicated to the sport who wish

every hunt to be a safe incident free experience for themselves and anybody they share the woods with.”

Respondents also offer suggestions for ensuring safe hunts, such as banning buckshot and limiting magazine capacity. Some respondents suggest using testing, expense, and the willingness of hunters to assist with Refuge goals to ensure that only a safe and ethical subset of hunters have access to the Refuge.

Advocates of hunting also claim that hunting provides effective population control for nuisance species, arguing that waterfowl befoul water and recreation areas, and that deer cause traffic accidents, browse crops and ornamentals, and carry lyme disease-infected ticks.

Hunters also assert that their activities are humane, asserting that overpopulation will be addressed either through lingering, painful deaths by starvation or disease, or through quick and painless execution.

Some respondents support hunting but are concerned that access to Oxbow may be being increased too much, and ask that use be monitored and adjusted as necessary. Some respondents ask the agency to limit expansion to what can be handled by existing enforcement capability. Some respondents ask that waterfowl hunting at Oxbow include “the marshes and potholes,” as well as Hop Brook near the train tracks. One respondent urges that there be no limits on waterfowling.

One respondent suggests that pheasant stocking continue at Oxbow, but not be expanded to Assabet.

Opposition to hunting

Opposition to hunting at the EMNWR is intense and widespread, at least within the subset of individuals who provided comment on the CCP. When respondents differentiate between game species, opposition to hunting turkey and grouse is common, but support for a limited deer hunt is more common. Leaving aside public safety, and the associated question of displacement, comments which question the wisdom of permitting (or expanding existing) fall into four broad categories: requests for additional analysis; concern over impacts; moral outrage; and concerns about iniquitous treatment of recreationists.

Additional Analysis

Some respondents don’t plainly oppose hunting, but ask for additional analysis to justify and focus hunting. For example, one respondent says, “I am not in favor of hunting in that area unless it is required to control species that have no natural means of control, and justified by appropriate studies.” Some respondents suggest that hunting not be regarded as recreation, but as wildlife population management, and that therefore it should be utilized only where comprehensive biological surveys and analysis indicate it would be of value for biodiversity or habitat protection. These respondents argue that only species with real overpopulations should be hunted (and ask for hard evidence, rather than anecdotes of browsed ornamentals), excluding species—such as woodcocks—that appear to be in decline. Some respondents question whether scientific analysis will indicate that hunting in such a limited area will have real impacts on area populations.

Some respondents assert that the CCP inadequately analyzes the impact of hunting. Respondents request more data on the cost of ministering to hunters, on impacts on public safety, habitat, and species, and on methods of implementation. Some respondents ask the FWS to evaluate the economic impacts of hunting, positing that displacement of other recreationists' results in negative impacts. Respondents ask for boundary clarifications and improved maps of available hunting areas. Respondents ask whether the agency has assessed its liability for hunting accidents.

Connected with the sense that analysis is inadequate is the argument that the "cure" is inappropriate to the problem. Respondents suggest that beavers be controlled through non-lethal means, which they argue have been proven more effective than trapping.

Impacts

Several respondents oppose hunting based on perceived impacts to other resources. As one respondent writes, "A great number of migratory birds rely on this sanctuary for breeding, as do many amphibians, reptiles, fish and mammals. Loud noise such as gun shot is known to interfere with breeding. Such interference seems in direct conflict with the intent of this land as sanctuary." Numerous area residents complain that the sound of gun shots is aesthetically disturbing as well as frightening.

Several respondents express concern about the impact of lead shot on wildlife and water quality. Several respondents argue that hunting off-trail with or without dogs will cause damage, and suggest that off-trail use be as limited for hunters as it is for other recreationists. Several respondents argue that many migratory birds are in decline, and ask that none be hunted.

Moral objections

Comments from both area residents and apparent respondents to a campaign by animal rights organizations indicate revulsion at the idea of hunting, particularly on a national wildlife refuge. For example: "Of all the violent, destructive activities in the world, hunting is right up at the top of the list. I am really disgusted at these proposed changes, as is the rest of my family. We live very close to Great Meadows, and I'm sure that the last thing we want to hear in the middle of a peaceful Saturday afternoon is gunfire ripping through the air followed by the squeal of a helpless animal gasping its last breath." Or: "Hunting, especially trapping, is an unnecessary and cruel attack on nature's innocent creatures. To permit people to entertain themselves by cruelly destroying the lives of other beings is unconscionable. Hatred, selfishness, and violence tear the world we live in today. Encouraging people to hunt and to kill does nothing to heal our wounds and move us toward a better world."

Respondents argue that hunting should not be permitted, because, they allege: it benefits a small constituency; fees for sportsmen and women are a minor part of overall conservation funding; hunters kill two animals for each they harvest, leaving the others to die suffering, lingering deaths; hunters present a danger to non-game species; in terms of population control, predators better select prey; hunting stresses wildlife.

Respondents are particularly angered by the idea of hunting on a refuge, which they perceive to be directly in conflict with the purpose and definition of a refuge. One typical respondent describes shooting wildlife on a wildlife refuge as “oxymoronic.”

Iniquity

A strong sentiment running through the comments is a sense that there is something inconsistent, unfair, and hypocritical about permitting hunting on the EMNWR while prohibiting activities such as dog-walking, jogging, and picnicking on the basis of their wildlife impacts. As one respondent writes, “It makes absolutely no sense to me that hunting will be allowed in the refuge, but dogs on leashes and bike riding will not be allowed. How in the world are dogs on leashes and people on bicycles considered dangerous to wildlife, yet people with guns are okay?” Or as a conservation group writes, “Inconsistent or arbitrary management of public use could lead to confusion and resentment. Why could someone who is hunting grouse have a dog (unleashed!) whereas non-hunters must leave their canine friends at home? Can a birdwatcher take along a sandwich, or is that considered picnicking? If the pace of a jogger spooks wildlife, then why can someone cross-country ski?”

Many respondents assert that quiet recreation opportunities are rare, but that adequate hunting is already available.

Hunting and Public Safety

Many respondents argue that expanded hunting will threaten the safety of area residents and other recreationists. It is easiest to consider these comments in two categories: threats to people, and displacement of recreationists.

Threats to people

Many respondents, including many local residents, argue that a) they will feel unsafe if hunting is permitted on the Refuge, and b) that people or animals will be injured or killed by friendly fire. A typical comment: “I was brought up learning how to handle a gun, including shotguns, and remember going deer hunting with my father in Lincoln, Lexington and other towns west of Boston—albeit over 50 years ago. . . . Without prejudice one way or the other about the justification for hunting, I think the CCP fails to address the important issue of public safety and the dangers resulting to adjacent schools, roadways and homes in the Refuge area. Clearly, MetroWest is already too overbuilt to allow for the extended hunting proposed in the CCP.” Or: “I do not want to be shot hanging clothes in my back yard.”

To protect visitors to other conservation lands, some respondents suggest that hunters be prohibited from using public access points to other lands (such as Foss Farm and Greenough Conservation lands). Local abutters and area residents are particularly concerned about stray or mistargeted bullets, and raise concerns regarding a number of specific sites such as the Maynard public school campus and the southern portion of the Sudbury unit.

One respondent raises concerns regarding the resources local law enforcement will expend as a result of increased hunting: “As the Chief of Police in the Town of Billerica I am concerned about proposed hunting on and around the Concord River. This has been a safety and noise concern for residents of west Billerica for many years. I feel that this proposed change will increase these problems. Please take into consideration that this end of the refuge is a

populated area and hunting can pose safety risks. Additionally this will cause an influx of Police calls to the area to determine if hunters are on private property or refuge land. Does the plan have any contingency to compensate the town for this added use of resources?"

Displacement

Many respondents aver that they will be unable to use the Refuge during hunting season. One respondent asks that the FWS "Expand the Compatibility Determination analysis to include an assessment of recreational compatibility. This should include a determination that the conditions that motivated the past Refuge Manager to ban hunting have been alleviated." Respondents argue that creating an exclusive use for significant portions of the year is unfair and unwise. Some respondents express significant concern for area recreationists over unmarked and porous boundaries between the Refuge, conservation land, and residences, particularly where hunters might go off-trail. A typical respondent writes, "I am also opposed to hunting, not for moral reasons, but for safety reasons. I and my dogs were the target of a hunter at Great Meadows several years ago. I had to hit the ground and crawl behind a tree for safety. He didn't see me, though when he heard me, he took off in a hurry."

Some respondents complain that hunting season occupies optimal use times for the Refuge, one respondent stating that no one uses refuges in summer because "the deer flies will kill you." Several respondents think along similar lines, suggesting reduced hunting opportunities to permit other recreation: "Maybe hunting could be limited to a few weekends per season," writes one, while another suggests a couple days of hunting per week. Another respondent suggests things would be better "if you had one or two hunting days where experienced hunters signed up to do a 'cull' if you could actually get them to kill sick, old and slow individuals instead of the healthiest, biggest and most impressive animals—and those days be highly publicized so innocent people wouldn't be hurt."

Some respondents suggest that the only safe course of action is to close the Refuge to other uses during hunting season.

To alleviate these concerns, some respondents argue that hunting should only be done by professionals paid by the refuge for wildlife management: "If the refuge needs to use deadly force to carry out the mission, have that applied by trained professionals and not by anyone with ten bucks and a shotgun."

Several respondents mention the need to educate both hunters and area residents on the schedule and placement of legal hunting. Several respondents talk about the need to increase law enforcement to deal with increased hunting, and some assert that the Refuge's record of successful interdiction of motorized trespass and vandalism indicates a current inability to enforce laws, and little confidence that hunting can be safely policed.

Dogs and Public Safety

A number of respondents offer intensely felt comments advocating continued use of dogs on the refuge as a matter of personal safety. These respondents, all women, state that prohibiting dogs effectively prohibits their use of the refuge, e.g., "I am a woman and very aware that when I am in the woods—I am an easy prey object for defective human types. I would never walk alone in the woods without my dog—a 120 pound dog at my side is a huge deterrent to

even trying something. I have been approached in the past by questionable behavior and my dog at that time did place himself between me and the man creeping up behind me. The man turned and left. By banning dogs on-leashes at Great Meadows you effectively ban all women.”

Fishing

With the exception of the occasional “let us fish anywhere we want,” most fishing comments are restricted to Puffer Pond on the Assabet River. There is considerable support for fishing on Puffer Pond, and for the proposal to do so, and some respondents argue that anglers infrequently transport invasives.

There are also a number of respondents who request that fishing be prohibited on Puffer Pond. Respondents argue that anglers will disturb nesting birds, erode the shore, trample vegetation, bring in invasives, and drag boats through the refuge. As one respondent writes, “Little consideration has been given to the effect [fishing] would have upon Puffer Pond's habitat. The shoreline risking areas would gradually be expanded by use, destroying additional shoreline habitat and pond plants. Trash that is left behind such as beverage containers, fishing gear wrappers, tangled fish line in trees, on the ground and in the water, are a danger to birds, waterfowl, and other wildlife. How a shoreline fishing area would be made handicapped accessible is not discussed. Catch and release is an ideal fishing concept. However, it can prove to be fatal to many fish due to hook swallowing and extraction. Enforcement of catch and release will be difficult. Due to the small size of the pond, the popularity of fishing, and the high density of the area, the pond would soon be in danger of being greatly depleted. This rapid removal of fish would affect other wildlife populations that depend upon the pond for food. These would include the colony of great blue herons currently residing in the refuge near the pond, raccoon, and other water and fish dependent animals.”

Respondents concerned about impacts to Puffer Pond, but not categorically opposed to fishing, suggest very limited shoreline access to the Pond, to reduce impacts, and in one case a prohibition on the use of treble hooks. One respondent offers extensive recommendations for minimizing the threat of invasives.

Several respondents ask how the agency intends to adequately enforce restrictions and monitor impacts at Puffer Pond.

Environmental Education

A large majority of respondents who chose to address this section of the CCP support the environmental efforts and facilities proposed in Alternative B, advocating more environmental education for people of all ages. Several respondents encourage completion of the proposed Sudbury River interpretive canoe trail. Several respondents encourage the FWS to think bigger, and develop its educational plan in concert with other regional entities and efforts, such as a Sudbury-Concord River valley regional conservation study and education effort. One respondent urges that “a full-scale information/education center is included as part of the future considerations for the Oxbow. . . . The Oxbow is also significant because it

offers the additional opportunity for linkages with other state, private and town owned lands. And it is also situated in the center of the proposed Freedom's Way National Heritage Area.” One respondent urges the FWS to use the refuge principally for biological studies.

With regard to facilities, one respondent is “very interested in the potential development of a visitor center in the area of Great Meadows NWR. We would like to explore any opportunities to increase the public understanding of the Sudbury, Assabet River and Concord Wild and Scenic Rivers within the educational materials and displays presented at the visitor center.” One respondent urges the FWS to continue historical tours: “These have been very popular and have provided a way by which some of Maynard's older residents can view the refuge. Several such tours a year would provide access to history and wildlife through use of a motorized van or bus.”

One organization requests clarification on facilities development “The proposed management of public outreach is unclear. The only designated public outreach position is slotted for Great Meadows. Does this position support all three refuges, or Great Meadows, or the complex as a whole? Does this individual coordinate volunteer efforts and recruit volunteers for all three refuges, or Great Meadows, or the complex as a whole?”

Some respondents complain that recreational restrictions undermine opportunities for education at the refuge, and urge that leashed dogs and off-trail nature study and photography be permitted. Several respondents urge the FWS to close some areas to hunting to permit educational tours in spring and fall.

Recreation

Due to the refuge's proximity to heavily populated areas, and an already existing recreational trail system, accessing the refuge for recreation is a major concern of many respondents. Some respondents even see the refuge as a sort of town park. Many local residents that responded did not expect restrictions on recreation when they supported FWS's offer to buy the property. Others support the concept that wildlife sanctuary should be the priority, and use limitations should be imposed.

Some respondents see access for recreation at the refuge as a means to an end: "Through controlled access to refuges you can create and sustain a community of citizens who will not only care for the refuges but also support the Fish and Wildlife Service in its struggle to maintain them."

Some respondents want the refuge to be used for quiet sports only, and ask that motors be prohibited to reduce noise, air and water pollution, erosion of soil, and to increase safety. As one respondent states, "I urge you to support making the refuge into a place where passive recreation can take place. By that I mean prohibiting motorized vehicles and hunting. The land is a treasure for hikers, bikers, runners, birdwatchers, nature lovers and, as such, should be preserved for this and future generations."

Snowmobiling

Snowmobilers describe themselves as law-abiding recreationists that are respectful of others and wildlife. One local snowmobile club would like to establish a trail through the refuge, maintained by the club, for the club's enjoyment. This club goes on to point out that snowmobiling will not harm the terrain or wildlife because snowmobiling usually occurs from the beginning of January to the beginning of April (at the latest) and only when there is a minimum of four inches of snow. Further, snowmobiling is already governed by Massachusetts laws requiring, among other things, that snowmobiles stay on the trail. Snowmobiling, the club concludes, is a traditional use in the area and ask the FWS to let snowmobilers use traditional trails.

Jogging

Joggers view the refuge as a safe, peaceful place to pursue their activity, and are confused as to why jogging would be banned. One respondent states that the refuge ". . . is a beautiful place to jog, particularly because it is one of the few off-road places with no early morning traffic. It would be shame if joggers were not allowed to use the paths of the Wildlife refuge." Another respondent asserts that, "The joggers I've seen are respectful of walkers, seems inconsistent when hiking, snowshoeing, and cross-country skiing are allowed." Another respondent writes: "If anyone ever asks, I guess I'll just tell folks, 'Oh no, I'm not running, I'm just hiking real fast.'"

Picnicking

Picnicking is viewed by many respondents as a harmless past time that allows people to enjoy the refuge's beauty. As one respondent puts it, "Is this really such a huge problem? On my daily walks I never see any trash along the trails. . . . What is so bad about taking a family, a lunch basket, and enjoying a couple of hours surrounded by nature?" These respondents ask the FWS to allow picnicking within the refuge.

Bicycling

Similar to jogging, many respondents assert that the refuge offers a safe, traffic-free environment for bicycling. These respondents also point out that bicycling is already an important component of the surrounding towns, and that many local residents have moved into the area because of its extensive town trail system. By not allowing bicycling in the refuge, FWS will be creating a gap in the local trail systems. For example, the nearby areas of the Stow Town Forest, the Sudbury State Forest, the Memorial Forest Reservation, and Desert Natural Area allow bicyclists on the trails. The addition of the refuge to this significant resource would yield excellent opportunities for exercise and enjoyment of the natural setting, by allowing cyclists to connect with other available areas. Therefore, respondents ask that the refuge acknowledge the local trail systems' benefits by allowing responsible cyclists to use the refuge's roads. Some cyclists are willing to be flexible as to when and where they can pursue their sport. One respondent suggests FWS provide signage to indicate allowed routes and speed limits to help restrict bicycling that may conflict with wildlife activities. Another proposes that the FWS set aside periods during the day when bicycling would be permitted. Others suggest allowing cycling on paved roads only.

Other respondents aren't as sympathetic to cyclists, and would like to see bicycles kept off the refuge. One respondent asserts that riding a bike is a poor way to observe wildlife, and that if the refuge allows cycling, many cyclists would speed through or venture off designated paths.

Horseback Riding

As with the cyclists, equestrians are concerned that not allowing horseback riding in the refuge will compromise access to other conservation/state/local forest trails immediately surrounding the refuge, such as the Stow Town Forest, Sudbury State Forest, Marlboro State Forest, Sudbury Conservation Land, and the Desert Memorial Forest. The refuge is located directly in the middle these properties, and presently corridors allow horseback riders to travel from one conservation land to another. Further, this group asserts that horseback riding has not impacted other uses in the aforementioned areas. These trail riders ask that the refuge be open to horseback riding, and that consideration be given to an access trail so riders may traverse the refuge to access other conservation areas. Another respondent asks FWS to work with various trail riding and breed organizations in Massachusetts, to establish a horseback riding plan that serves the needs of wildlife and those who enjoy nature from horseback. Further, the Bay State Trail Riders offer to help with the maintenance of any connector trails with volunteer work days and funds if necessary.

Some respondents point out the economic benefits of horseback riding, stating that equine activities are engaged in by a large number of Massachusetts citizens and also make a significant contribution to the Massachusetts economy. For example, they assert that equine agriculture provides over \$200 million per year in direct spending into the Massachusetts economy, over 5,000 jobs and more than \$13.2 million in state and local tax revenues. Limiting horseback riding would harm the economy.

Equestrians state that they oppose expansion of the refuge's boundaries as long as it limits horseback riding.

Dog-Walking

Many respondents assert that given the popularity and demand for areas to walk dogs, and the fact that parts of the refuge have been used responsibly for decades by dog-walkers; FWS should make part of the refuge available for this pastime. These dog walking enthusiasts request that leashed dog-walking be allowed on refuge trails in appropriate areas, and that strict fines are in place for anyone releasing a dog or failing to pick up after their animal. Others are willing to allow an exclusion of dogs during the most sensitive times, when wildlife surveys identify an impact on nesting birds or other animal life. Many of these respondents view dog-walking as meditative and a way of connecting to the natural beauty of the earth, something that is consistent with refuge goals. These respondents assert that without substantial evidence that dog-walkers are threatening the integrity of the refuge it is unjust and an act of discrimination to prohibit dog-walking. On the other hand, one respondent would like to see dogs banned from the refuge, stating that many dog owners don't obey leash rules to the detriment of wildlife, and further, even on a leash dogs frighten animals.

Birdwatching

Birdwatchers and nature photographers are concerned that they will be confined strictly to trails when observing wildlife, while hunters would not. If hunters are allowed off trail, they assert, birders should be allowed off trail as well.

Trapping

Some respondents ask that the Refuge be open to beaver and muskrat trapping, asserting that modern traps are instant and humane, and arguing that small game threatens children, pets, and livestock, and that beavers "cause extensive property damage."

Some respondents ask whether and under what circumstances which furbearers could be trapped, and what constitutes an invasive species and appropriate control methods. Some respondents oppose trapping on the grounds that it is inhumane; other respondents perceive trapping as ham-fisted interference in natural systems that function best on their own.

Socioeconomic Concerns

Several respondents applaud Alternative B for helping to make Maynard a “destination.” One respondent requests permission to graze in the Oxbow unit, and one requests continued cooperative farming.

Several area residents request development of an “abutter policy,” without clearly articulating what the components of such a policy would be.

Several respondents urge consideration of impacts to area parking, specifically at Monsen Road at Great Meadows, and at the east gate of Assabet River off Old Marlborough Road. Some respondents are concerned about refuse at entry points.

Appendix A

Coding Structure and Demographic Codes

Eastern Massachusetts National Wildlife Refuge Complex Draft CCP/EA

Header Information

Coders will identify organization type, number of signatures, response type and delivery type on all letters by filling in the proper box. Use **CIC** (Common Interest Class) field only if this information is requested by the Administration. Fill in additional fields when necessary.

Header Order: **MID**, **OT**, **S**, and **RT**, and **DT** fields are required. **IA**, **UT**, **LG**, **F**, **CIC**, **RI**, and **CE** fields are optional fields and used only where necessary. The **TS** (Total Signatures) field will tally automatically in Oracle. A stamp containing these fields will be placed on the working copy.

MID	OT	S	RT	DT	IA	UT	LG	F	CIC	RI	CE	TS	

Mail Identification (MID)

The Mail Identification number is a unique respondent number assigned in the CAET Oracle Program. The Oracle form contains mailing information needed to create mailing labels and obtain project specific demographic information about a respondent.

Organization Types (OT)

The Organization Type code identifies a specific type of organization, association, government agency, elected official, or individual.

Government Agencies and Elected Officials

F	Federal Agency
N	International Government/International Government Association
S	State Government Agency/Elected Official/Association
C	County Government Agency/Elected Official /Association
T	Town/City Government Agency/Elected Official/Association
Q	Tribal Government/Elected Official/Tribal Member/Association
E	Government Employees Organizations/Unions

- FW** Fish Wildlife Service Employee
XX Regional/other governmental agency (multi-jurisdictional)

Business and Industry

- A** Agriculture Industry or Associations (Farm Bureaus, Animal Feeding)
B Business (my/our, Chamber of Commerce)
G Range/Grazing Orgs and Permittees
HT Hunting/trapping Industry or Org
M Mining Industry/Assn (locatable)
O Energy Industry (Oil, Gas, Coal, Pipeline)
U Utility Group or Org (water, electrical, gas)
L Timber or Wood Products Industry/Assn

Other Organizations

- AD** Academic
AR Animal Rights
CH Church/Religious Groups
D Placed Based Groups (Multi-issue, focused on a specific region—i.e., QLG)
H Consultants/legal representatives
J Civic Organizations (Kiwanis, Elks, Community Councils)
K Special Use Permittees (Outfitters, Concessions, Ski Areas)
P Preservation/Conservation Organization
PA Professional Association/Society
QQ Tribal Non-Governmental Organization/Member
RB Mechanized Recreation (bicycling)
RC Recreational/Conservation (Trout Unlimited, Elk Foundation, Ducks Unlimited)
RM Recreational - Motorized
RN Recreational - Non-Motorized (hiking, biking, horseback riding)
SC All Schools
X Conservation Districts
Y Other (Organization with an indecipherable focus—i.e., Ice Cream Socialist Party)
Z Multiple Use/Wise Use

Unaffiliated

- I** Unaffiliated Individual or Unidentifiable Respondent

Number of Signatures (S)

The number of signatures is the total count of names associated with a mail identification (Mail ID) number. The procedure for determining the number of signatures for a Mail ID number is consistent across all response types. In other words, letters, forms, and other types will be treated the same for determining the number of signatures. Each individual name associated with one Mail ID is counted as one signature. When a Mail ID has an incomplete name associated with it, such as an anonymous letter or an email address, it is counted as one signature. Mr. and Mrs. X are counted as two signatures.

Response Type (RT)

The Response Type identifies the specific format of correspondence.

- 1** Letter
- 2** Form or Letter Generator
- 3** Resolution
- 4** Action Alert
- 5** Transcript (dictated Audio, Video, Telephone response)

Delivery Types and Descriptions (DT)

The Delivery Type identifies the method of delivery for the correspondence.

- E** Email
- F** Fax
- H** Hand-delivered/oral testimony (personally delivered)
- M** Mail or commercial carrier (includes video, audio, letter format)
- T** Telephone
- U** Unknown

User Type (UT)

The User Type identifies the purpose for which an individual, organization, or agency uses public lands/refuge.

- A** Area Residents
- B** Businesses and Services
- D** Dog Walkers
- E** Environmental Educational
- K** Bikers
- F** Anglers
- H** Hikers
- P** Photographers
- W** Non-motorized Recreation
- M** Motorized Recreation
- S** Horseback Riding
- T** Hunters
- X** Non-identifiable

Early Attention (IA)

Early Attention codes are applied only to those documents requiring an early response from the ID team. The Early Attention codes are listed in order of priority. If more than one code applies to a single document, the code with the highest priority is attached.

- 1** **Threat of harm** – Any response that threatens physical harm to administration, agency, or project personnel.
- 2** **Notice of appeal or litigation** – Any response that describes the respondents' intent to appeal an action or bring legal suit against the agency.

- 3 Freedom of Information Act (FOIA) requests** – Any response that officially requests information and documentation under the FOIA.
- 4 Provides proposals for new alternatives** – Any response that suggests a new alternative to the proposed action. These do not include critiques of alternatives or partial changes of existing alternatives.
- 5 Requires detailed review** – Any response that requires detailed review. These responses may include detailed scientific or technical analysis, or significant enclosures.
- 5A Provides extensive technical edits** – includes extensive use of lined out text, suggestions to delete text, and/or replace text.
- 5M Provides maps** – Any response that includes map enclosures.
- 6 Government entities** – Any response from an elected official, writing in his/her official capacity, representing a Federal, State, county, or municipal government. Also includes official correspondence from any government agency.
- 6A Requests for cooperating agency status from a government entity.**
- 7 Public hearing** – Any response that requests a public hearing.

Information Request (RI)

Information Request codes are applied only to those documents with specific requests for information pertaining to the proposal.

- A** Mailing List Only/Nothing to Code
- B** Request to be Removed from the Mailing List
- C** Request for Copy of Federal Register Notice
- D** General Request for Other Information
- E** Request for Confirmation of Receipt of Letter

Comment Extension Request (CE)

Comment Extension codes are used when a respondent has a specific request for extending the comment period.

- 0** Request to Extend the Comment Period

Eastern Massachusetts National Wildlife Refuge Complex Draft CCP/EA

The coding structure is a topical outline with alpha and numeric codes attached. It is a tool to identify public comments and sort them into recognizable topic categories. Once comments are assigned codes, they are then entered into a database from which they can be reported and sorted in any combination needed for analysis.

The coding structure is organized into required fields called subject and category codes. Subject codes are five-character alpha codes that represent broad themes associated with a project. Category codes are five-digit numeric codes that define specific subtopics within each subject code, and they are generally arranged from the general to specific with subcategories nested within categories.

PLANN (Subject Code) - Introduction - Chapter 1 and Coordination with Others - Chapter 5

10000 (Category Code) Planning Process and Policy

- 10100 Timeframes for planning/Length of comment period (*adequacy of, timing*)
- 10200 Public Involvement (*General strategies, methods & techniques, collaborative efforts, pre-EIS/CCP consultation*)
- 10300 Scoping (*General comments, planning before the EIS*)
- 10400 Relationship to other planning processes (*Conflicts with other area projects, general planning*)
- 10500 Statutory Authority (*Compliance with laws and regulations; general references to violations of NEPA, APA, NFMA, Planning Regs. For resource-specific regulations, code to resource*)
- 10600 Science/Resource-Based Decision-Making (*Use of science in Decisionmaking; general references to use of science and scientific documents*)
- 10700 Budgetary Ramifications (*References to the cost of implementing the proposed rule, project funding*)
- 10800 Agency Organization, Structure and Staffing (*General comments not specific to project, includes trust and integrity issues*)
 - 10810 Trust and Integrity
- 10900 Coordination & Consultation (*Interagency, State, Private, Tribal*)
- 11100 Clarity/organization of planning documents
- 11200 Technical and Editorial Comments

12000 Purpose and Need (*General references to the purpose and need of the CCP/EA and needs for further analysis; if specific, code to the resource*).

- 12100 Project Area (*Scope of project*)
- 12200 Proposed Action/ Decision to be Made (*What it should/should not include*)

- 12300 Range of Issues Identified through Public Scoping (*General; Comments specific to resource areas go to AFFEC*)
- 12400 Issues and Concerns Considered Outside the Scope of This Analysis
- 12500 Permits and Agency Approvals Required
- 12600 Guiding Policy for Public Lands (*General land management philosophies*)

ALTER - Alternatives - Chapter 2

13000 Alternatives (Comments that simply vote, without rationale)

- 13100 Alternative A: Current Management (*General comments not specific to a resource; Assumptions made in the analysis*)
- 13200 Alternative B: Proposed Action
- 13300 Alternative C
- 13400 Formulating Alternatives (*Issues used, Design criteria, Development, etc.*)
- 13500 Features common to all Alternatives
- 13600 Features common to Action Alternatives only (B & C)
- 13700 Alternatives Considered But Not Given Detailed Study (*Same as eliminated alternatives*)
- 13800 Range/Comparison of Alternatives (*General comments, adequacy of range; I like A & C better than B*)
- 13900 New Alternatives (*Support for or recommendation for a new one*)
 - 13910 Alternative Matrices (*Including Map comments and references*)

AFFEC - Affected Environment - Chapter 3, and Environmental Consequences - Chapter 4

14000 Physical, Biological, and Socio-Economic Resources (general Climate comments, extensive lists)

15000 Geology/Topography

- 15100 Analysis of Existing Conditions and Need for Further Analysis
- 15200 General Management Direction (*including other Management Impacts on this Resource*)
- 15300 Cumulative Impacts
- 15400 Mitigation and Monitoring

16000 Soils

- 16100 Analysis of Existing Conditions and Need for Further Analysis
- 16200 General Management Direction (*including other Management Impacts on this Resource*)
- 16300 Cumulative Impacts
- 16400 Mitigation and Monitoring

17000 Hydrology

- 17100 Analysis of Existing Conditions and Need for Further Analysis
- 17200 General Management Direction *(including other Management Impacts on this Resource)*
- 17300 Cumulative Impacts
- 17400 Mitigation and Monitoring

18000 Air Quality

- 18100 Analysis of Existing Conditions and Need for Further Analysis
- 18200 General Management Direction *(including other Management Impacts on this Resource)*
- 18300 Cumulative Impacts
- 18400 Mitigation and Monitoring

19000 Water Quality

- 19100 Analysis of Existing Conditions and Need for Further Analysis
- 19200 General Management Direction *(including other Management Impacts on this Resource)*
- 19300 Cumulative Impacts
- 19400 Mitigation and Monitoring

20000 Vegetation and Habitat Types

- 20100 Analysis of Existing Conditions and Need for Further Analysis
- 20200 General Management Direction *(including other Management Impacts on this Resource)*
- 20300 Forested and Shrub Dominated Wetlands
- 20400 Vernal Pools and Ponds
- 20500 Bordering Communities *(Uplands, Marshes, Swamps)*
- 20600 Invasive or Overabundant Species
- 20700 Cumulative Impacts
- 20800 Mitigation and Monitoring

21000 Wildlife and Fisheries

- 21100 Analysis of Existing Conditions and Need for Further Analysis
(Fencing)
- 21200 General Management Direction *(including other Management Impacts on this Resource; general habitat comments.*
- 21300 Migratory Birds
- 21400 Mammals
- 21500 Reptiles and Amphibians
- 21600 Fisheries
- 21700 Invertebrates

21800 Cumulative Impacts

21900 Mitigation and Monitoring

22000 Cultural Resources and Special Designations (focus areas)

22100 Analysis of Existing Conditions and Need for Further Analysis

22200 General Management Direction *(including other Management Impacts on this Resource)*

22210 Land Acquisitions

22300 Refuge Buildings and Facilities

22400 Refuge Administration and Staffing

22410 Volunteers

22420 Enforcement

22500 Wild & Scenic River Plan / Designation

22600 Cumulative Impacts

22700 Mitigation and Monitoring

23000 Priority Public Uses

23100 Analysis of Existing Conditions and Need for Further Analysis

23200 General Management Direction *(including other Management Impacts on this Resource)*

23210 Access

23220 Fees

23230 Passes and Permits

23240 Visitor Safety

23241 Hunting

23242 Dog Walking

23300 Hunting *(If safety concern, code to 23241)*

23310 Big and Upland Game Hunting

23320 Migratory Bird Hunting

23400 Fishing

23500 Wildlife Observation and Photography

23600 Environmental Education and Interpretation

23610 Natural and Cultural History Tours

23620 Outreach for Public Awareness

23700 Cumulative Impacts

23800 Mitigation and Monitoring

24000 Recreation and Other Opportunities

24100 Analysis of Existing Conditions and Need for Further Analysis

24200 General Management Direction *(including other Management Impacts on this Resource)*

- 24300 Motorized Recreation
 - 24310 Snowmobiling
- 24400 Non-Motorized Recreation
 - 24410 Snowshoeing / X-Country Skiing
 - 24420 Walking/Jogging
 - 24430 Picnicking
 - 24440 Biking
 - 24450 Horseback Riding
 - 24460 Dog-Walking, general (*if safety concern, code to 23242*)
 - 24470 Bird Watching
- 24500 Cumulative Impacts
- 24600 Mitigation and Monitoring

25000 Socio-Economic Resources

- 25100 Analysis of Existing Conditions and Need for Further Analysis
- 25200 General Management Direction (*including other Management Impacts on this Resource*)
- 25300 Population and Demographic Conditions
- 25400 Schools
- 25500 Neighboring Communities
 - 25510 Infrastructure (*Roads, Plazas, Utility Corridors, etc.*)
 - 25520 Revenue Sharing
- 25600 Cumulative Impacts
- 25700 Mitigation and Monitoring

26000 Appendices (*General Comments and Technical/Editorial*)

ATTMT – Attachments

27000 [Attachment No., Title, Author's name]

Site Specific 1

The Site Specific 1 code is an up to four digit alpha/numeric comment specific code. For this project, the alpha-code is used to indicate which refuge the comment addresses.

- A Assabet River NWR
- G Great Meadows NWR
- O Oxbow NWR
- X Multiple NWRs/Null

Appendix B

Demographics

Demographic coding allows managers to form an overall picture of who is submitting comments, where they live, their general affiliation with various organizations or government agencies, and the manner in which they respond. The database can be used to isolate specific combinations of information about public comment. For example, a report can include public comment only from people in Massachusetts or a report can identify specific types of land users such as recreational groups, agricultural organizations, or businesses. Demographic coding allows managers to focus on specific areas of concern linked to respondent categories, geographic areas, and response types.

Although demographic information is captured and tracked, it is important to note that the consideration of public comment is not a vote-counting process. Every comment and suggestion has value, whether expressed by one or a thousand respondents. All input is considered, and the analysis team attempts to capture all relevant public concerns in the analysis process. The Content Analysis Team processed 1,907 responses. Because 28 responses are duplicates, the team entered 1,882 responses into the database representing 1,959 signatures, for the Draft CCP/EA.

In the tables displayed below, please note that demographic figures are given for number of responses, respondents, and signatures. For the purposes of this analysis, the following definitions apply: “response” refers to a discrete piece of correspondence; “respondent” refers to each individual or organization to whom a mail identification number is assigned (e.g., a single response may represent several organizations without one primary author); and “signature” simply refers to each individual who adds his or her name to a response, endorsing the view of the primary respondent(s).

Geographic Representation

Geographic representation is tracked for each response during the course of content analysis. Letters and emails were received from 49 of the United States, the District of Columbia, and one foreign country. The response format did not reveal geographic origin for 102 respondents.

Table C1 - Geographic Representation of Respondents by Country and State

Country	State	Number of Respondents	Number of Signatures
Costa Rica		1	1
United States	Alabama	9	9
	Alaska	2	2
	Arizona	22	22
	Arkansas	6	6

Country	State	Number of Respondents	Number of Signatures
	California	201	208
	Colorado	16	16
	Connecticut	19	19
	Delaware	1	1
	District of Columbia	4	6
	Florida	63	65
	Georgia	16	16
	Hawaii	4	4
	Idaho	2	2
	Illinois	45	45
	Indiana	16	16
	Iowa	3	3
	Kansas	10	10
	Kentucky	4	4
	Lousiana	7	7
	Maine	8	9
	Maryland	36	39
	Massachusetts	710	752
	Michigan	30	32
	Minnesota	21	21
	Mississippi	2	2
	Missouri	17	17
	Montana	2	2
	Nebraska	2	3
	Nevada	12	12
	New Hampshire	16	16
	New Jersey	35	38
	New Mexico	6	6
	New York	110	111
	North Carolina	28	29
	Ohio	30	31
	Oklahoma	6	6
	Oregon	14	14
	Pennsylvania	58	60
	Rhode Island	10	10
	South Carolina	13	14

Country	State	Number of Respondents	Number of Signatures
	South Dakota	1	1
	Tennessee	8	8
	Texas	68	69
	Utah	6	6
	Vermont	6	6
	Virginia	19	20
	Washington	29	29
	West Virginia	5	5
	Wisconsin	21	21
	Wyoming	2	2
	Unidentified	102	106
	Total	1,884	1,959

Organizational Affiliation

Responses were received from various organizations and unaffiliated individuals. Respondents include conservation organizations, wood products associations, as well as unaffiliated individuals and others. Organization types were tracked for each response.

Table C2 - Number of Respondents/Signatures by Organizational Affiliation

Organization Field	Organization Type	Number of Respondents	Number of Signatures
AR	Animal Rights	5	7
B	Business	1	1
D	Place-Based Group	6	6
F	Federal Agency/Elected Official	2	2
HT	Hunting/Trapping Organization	8	8
I	Unaffiliated Individual or Unidentifiable Respondent	1,820	1,885
J	Civic Organization	2	2
P	Preservation/Conservation Organization	14	14
RB	Recreational – Mechanized	1	1
RC	Recreational – Conservation Organization	2	2
RM	Recreational - Motorized	2	2
RN	Recreational – Non-motorized/Non-mechanized	2	2

Organization Field	Organization Type	Number of Respondents	Number of Signatures
S	State Government Agency	6	6
SC	Schools	1	1
T	Town/City Government Agency/Elected Official	12	20
Total		1,884	1,959

Response Type

Response types were tracked for each response received on the project. Responses were received as letters and public meeting transcripts.

Table C3 - Number of Responses/Signatures by Response Type

Response Type #	Response Type	Number of Responses	Number of Signatures
1	Letter	497	543
2	Form	1,334	1,365
5	Transcript	51	51
Total		1,882	1,959

Delivery Type

Delivery types were tracked for each response received on the project. Responses were received as email, fax, hand-delivered, standard mail, and one telephone call. Delivery type was not revealed for 11 responses.

Table C4 - Number of Responses/Signatures by Delivery Type

Delivery Type Code	Delivery Type	Number of Responses	Number of Signatures
E	Email	1,630	1,677
F	Fax	1	1
H	Hand-delivered	67	67
M	Mail or commercial carrier	172	202
T	Telephone	1	1
U	Unknown	11	11
Total		1,882	1,959

User Type

User type was tracked for each response received on the project. User types include anglers, bikers, area residents, dog walkers, photographers and others.

Table C5 - Number of Responses/Signatures by User Type

User Type Code	User Type	Number of Responses	Number of Signatures
A	Area Residents	202	220
B	Businesses and Services	1	2
D	Dog Walkers	14	15
E	Environmental Education	2	2
F	Anglers	2	2
H	Hikers	19	23
K	Bikers	7	7
M	Motorized Recreation	3	3
P	Photographers	2	2
S	Horseback Riding	25	26
T	Hunters	39	39
W	Non-motorized Recreation	8	8
X	No Identifiable Type	1,558	1,610
Total		1,882	1,959

Appendix C

Early Attention Letters

The early attention designation is attached to public responses in the content analysis database for a variety of reasons. Our intent is to identify responses that fall into certain key categories, such as threats of litigation or comments from government officials, etc. These designations alert the project team members to public concerns or inquiries that may require an agency response or may necessitate detailed project team review for policy, political, or legal reasons.

The early attention designated responses are primarily intended for an internal audience. The categories of responses selected are designed to meet project team needs. This report is not intended to, nor should it be construed to, obviate the need to review all responses.

CAT identified seven early attention categories. The relevant designations are outlined below and followed by report tables.

- 1 Threat of harm** – Any response that threatens physical harm to administration, agency, or project personnel.
- 2 Notice of appeal or litigation** – Any response that describes the respondents' intent to appeal an action or bring legal suit against the agency.
- 3 Freedom of Information Act (FOIA) requests** – Any response that officially requests information and documentation under the FOIA.
- 4 Provides proposals for new alternatives** – Any response that suggests a new alternative to the proposed action. These do not include critiques of alternatives or partial changes of existing alternatives.
- 5 Requires detailed review** – Any response that requires detailed review. These responses may include detailed scientific or technical analysis, or significant enclosures.
- 5A Provides extensive technical edits** – includes extensive use of lined out text, suggestions to delete text, and/or replace text.
- 5M Provides maps** – Any response that includes map enclosures.
- 6 Government entities** – Any response from an elected official, writing in his/her official capacity, representing a Federal, State, county, or municipal government. Also includes official correspondence from any government agency.
- 6A Request for cooperating agency status from a government entity.**
- 7 Public hearing** – Any response that requests a public hearing.

Table D1 – (4) Proposes a New Alternative

Letter Number	Name and Address	Remarks
41	Bette Stallman, Wildlife Scientist Linda Huebner, Program Coordinator Humane Society of the United States New England Regional Office 2100 L St. NW Washington, DC 20037	Respondent requests that the USFWS prohibit hunting and trapping in wildlife refuges. Respondent requests the inclusion of an alternative that emphasizes non-consumptive land uses.

Table D2 – (6) Government Entities

Letter Number	Name and Address	Remarks
97	Brenda Kelly Conservation Commission Chair 10 Mudge Way Bedford, MA 01730-2144	Respondent expresses concern for resident safety with regard to nearby hunting and asks the USFWS to address this issue.
98	Tricia Smith Carlisle Conservation Commission Chair P.O. Box 827 66 Westford Street Carlisle, MA 01741	Respondent expresses concern for public safety from proposed hunting on USFWS land. Also, respondent expresses concern regarding access for hunters across private land.
99	Ann Thompson Maynard Board of Selectmen Chair Municipal Building 195 Main Street Maynard, MA 01754	Respondent requests additional allowed uses of the refuge and encourages consistency with local planning processes.
100	Maureen Valente Town Manager 288 Old Sudbury Road Sudbury, MA 01776-1843	Respondent encourages increased refuge use for passive recreation activities; no hunting with firearms; and additional law enforcement.
101	Brian Monahan Wayland Conservation Commission Conservation Administrator Town Building 41 Cochituate Road Wayland MA 01778	Respondent requests no, or strictly regulated hunting in the refuge. Respondent also encourages the USFWS to increase its number of staff.

Letter Number	Name and Address	Remarks
102	John Dwyer Maynard Conservation Commission 4 Durant Ave Maynard, MA 01754	Respondent expresses concern regarding hunting impacts on public safety, wildlife populations, and other recreation activities.
103	Pamela Resor Massachusetts Senate State Senator District Office P.O. Box 1110 Marlborough, MA 01752	Respondent discourages hunting and trapping in the refuge.
104	Susan Pope The Commonwealth of Massachusetts House of Representatives State Representative State House, Boston 02133-1020	Respondent requests that hunting not be allowed in the refuge for safety and environmental reasons. Also, respondent discourages the USFWS from charging user fees.
106	Kathleen Farrell Board of Selectmen Chair 380 Great Road Stow, MA 01775	Respondent requests expansion of the proposed refuge acquisition boundary. Respondent also requests limitations on hunting as well as increased law enforcement for hunting activities.
108	Priscilla Ryder Conservation Commission Conservation Officer 140 Main Street Marlborough, MA 01752	Respondent encourages expansion of the proposed refuge acquisition boundary, increased law enforcement for unauthorized land use, and public education regarding the proposed introduction of hunting to the refuge.
109	William Galvin Massachusetts Historical Commission Secretary of the Commonwealth Massachusetts Archives Building 220 Morrissey Boulevard Boston, MA 02125	Respondent commends the proposed Draft CCP's compliance with Section 6 of the National Historic Preservation Act of 1966.
110	Wayne MacCallum Division of Fisheries and Wildlife Director	Respondent expresses concern for rare, threatened, and endangered species in the refuge, and encourages the USFWS to update species information.
111	Anne Gagnon Conservation Commission Conservation Administrator	Respondent encourages expansion of the proposed refuge acquisition boundary, and increased staffing to decrease user conflicts.
105	Charlie Gorss Conservation Commission Chair	Respondent supports proposed Alternative B.

Letter Number	Name and Address	Remarks
407	Patricia Perry Conservation Commission Administrative Assistant 380 Great Road Stow, MA 01775	Respondent encourages expansion of the proposed refuge acquisition boundary, discourages hunting within the refuge, and encourages coordination of refuge management with local communities.

Appendix D

Information Requests

Requests for additional information, excluding Freedom of Information Act requests, are presented in this appendix. CAT identified five information request categories. The relevant designations are outlined below and followed by report tables. In addition, requests for extension of the comment period are displayed below.

- A Mailing List Only/Nothing to Code
- B Request to be Removed from the Mailing List
- C Request for Copy of Federal Register Notice
- D General Request for Other Information
- E Request for Confirmation of Receipt of Letter

Table E1 – (D) General Requests for Information

Letter Number	Name and Address	Remarks
4	Kate Wheeler Maynard Open Space Planning Committee Chair 31 Harrison St Maynard, MA 01754	Respondent requests specific agency response to the Committee's concerns and notification of the final documents release.
18	Bonnie and John Chandler 183 Prospect Hill Road Harvard, MA 01451	Respondents request information on leasing part of the cow field across from their house for sheep and goat grazing.
117	Daniel Cassidy danc@arguscl.com	Respondent requests a copy of the Draft CCP and EA, and would like to be notified of any public hearings on the subject.
132	Edmund Schofield P.O. Box 598 Boylston, MA 01505-0598	Respondent requests hard copy of the Draft CCP and EA.
200	John Dwyer mjohndwyer@verizon.net	Respondent requests Lindsay Krey's email address.
307	Jason Hetherington hetherjw@yahoo.com	Respondent requests online links to information regarding the proposed project.
342	David Stepp 69 Peabody Dr. Stow, MA 01775	Respondent requests information regarding proposed types of hunting and seasons for the refuge.
353	Sally Hewitt Sarah.Hewitt@Simonandschuster.com	Respondent requests notification regarding meetings or plans about bicycling in the Assabet River NWR.

Table E2 – (E) Request for Confirmation of Receipt

Letter Number	Name and Address	Remarks
374	Steve Parker 109 Moore Road Sudbury, MA 01776	Respondent requests confirmation of receipt of letter.

Table E3 – Requests for Comment Period Extension

Letter Number	Name and Address	Remarks
13	Michael Ojemann Great Meadows Neighborhood Association 153 Monsen Road Concord, MA 01742	Respondent requests extension of comment period, no specific length of time specified.
69	Hope Luder 5 Edgehill Road Billercia, MA 01862	Respondent requests extension of comment period, no specific length of time specified.
138	Kathleen Farrell 267 Sudbury Road Stow, MA 01775	Respondent requests extension of comment period, no specific length of time specified.
121	Louise Berliner Strongwhitepine@aol.com	Respondent requests extension of comment period, no specific length of time specified.
232	Rob Aldape Joropab1@mac.com	Respondent requests extension of comment period, no specific length of time specified.

Appendix E

Organized Response Report

Organized response campaigns (forms) represent 70 percent (1,334 of 1,907) of the total responses received during the public comment period for the proposal.

Forms are defined as five or more responses, received separately, but containing nearly identical text. Once a form is identified, a “form master” is entered into the database with all of the content information. All responses with matching text are then linked to this master form within the database with a designated “form number.” If a response does not contain all of the text presented in a given form, it is entered as an individual letter. Duplicate responses from four or fewer respondents are also entered as individual letters.

Table F1 – Description and Number of Signatures for Each Form

Number of Form	Number of Signatures	Description of Form
1	11	FWS should reconsider the determination that horseback riding is not compatible with the purpose of the refuge. Opposes acquisition boundaries expansion.
2	1,104	FWS should not increase hunting/trapping in Oxbow National Wildlife Refuge, and prohibit hunting/trapping in the Assabet River and Great Meadows National Wildlife Refuges.
3	250	FWS should not increase hunting/trapping in Oxbow National Wildlife Refuge, and prohibit hunting/trapping in the Assabet River and Great Meadows National Wildlife Refuges. FWS should focus on habitat improvement and non-lethal methods of wildlife management.
Total:	1,365	

Appendix F

List of Preparers

Content Analysis Team

Project Coordination

Shari Kappel, Team Leader

John Adams, Assistant Team Leader

Program Coordination

Jody Sutton, Coordinator

James MacMillen, Contracting

Content Analysts

John Adams, Editor/Analyst

Anne Jensen, Writer/Analyst

Angela Concepcion, Writer/Analyst

Holly Schneider, Writer/Analyst

Theodore Hughes, Writer/Analyst

Karl Vester, Coder/Analyst

Database Administration

Buell Whitehead, Technical Support

Information Systems

Lori Warnell, Project Lead/Response Processing/Data Technician

Julie Easton, Data Technician

Kay Flink, Data Technician

Jon Hardes, Data Technician

Geraldine Hill, Data Technician

Linda Kenaston, Data Technician

Shanna Robison, Data Technician

Barbie Gibson, CD Production